



**ALLTEL SERVICE CORPORATION**  
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June 20, 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, DC 20554

RE: In the Matter of Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, CC Docket No. 92-115

Dear Mr. Caton:

Enclosed for filing on behalf of ALLTEL Mobile Communications, Inc. are an original and nine copies of its comments in the above referenced proceeding.

Should there be any questions concerning this matter, please contact the undersigned counsel.

Sincerely,

A handwritten signature in cursive script, reading "Carolyn C. Hill". The ink is dark and the signature is fluid.

Carolyn C. Hill  
Federal Regulatory Counsel

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Enclosures

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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In the Matter of )  
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Revision of Part 22 of the ) **CC Docket No. 92-115**  
Commission's Rules Governing )  
the Public Mobile Services )

**Comments of ALLTEL Mobile Communications, Inc.**

ALLTEL Mobile Communications, Inc. (ALLTEL) hereby submits its comments in response to the Commission's Further Notice of Proposed Rulemaking ("Notice"), released May 20, 1994, FCC 94-102, in the captioned proceeding. ALLTEL and its subsidiaries provide cellular and paging services in various parts of the United States and, therefore, will be affected by many of the proposed revisions.

**Introduction**

In the Notice, the Commission indicated that the proposed revisions were intended to eliminate unnecessary information collection, to streamline licensing procedures, to reduce processing and review burden on the staff, and to ensure that licensees are fully qualified to provide service to the public as expeditiously as possible. Based on its review of the Notice, ALLTEL believes that the proposed revisions, with some minor refinement or clarification set forth below, should result in the achievement of these goals.

**Proposals affecting ALLTEL's cellular service:**

A. Service Area Boundary Extensions

ALLTEL understands the Commission's concerns regarding identification of any SAB extensions into unserved areas. However, rather than having the applicant state in each

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instance whether the 5 year fill-in period for the market has expired and, if so, to state that the SAB extension does not cover any unserved area, ALLTEL believes that this requirement should be imposed only with respect to the applications where this situation exists. The Commission could assume, absent such a statement in the application, that the applicant was not proposing to extend into an unserved area.

Also, with respect to SAB extensions, ALLTEL proposes one refinement of the Commission's Rules. That is, in the situation where an SAB extension covers an unserved area less than 50 square miles and the applicant has obtained the consent or waiver of the right to file of the other adjacent licensees, the applicant should be able to file FCC Form 489. ALLTEL submits that this refinement would streamline the licensing procedure and facilitate the timely provision of service to the public, consistent with the goals of the Commission in this proceeding.

B. Map Scale

ALLTEL supports the Commission's proposed rule change that maps be filed on a scale of 1:500,000. However, because companies such as ALLTEL currently have a large inventory of maps on a scale of 1:250,000, ALLTEL suggests that carriers be given the option to file maps on either scale for at least a two year period of time.

C. Elimination of Licensing for Inner Cell Sites

ALLTEL endorses the Commission's proposal to eliminate the licensing for inner cell sites. This rule would expedite the provision of services by all cellular carriers and reduce the administrative costs of not only the carriers, but also of the Commission. The only concern that ALLTEL has with respect to this rule change is that the interference protection

currently afforded to inner cells when FCC Form 489 is filed is not lost if the proposed change is adopted. Accordingly, ALLTEL requests that the Commission clarify that this concern is unnecessary. ALLTEL believes that questions regarding inner cell sites could be resolved by the Commission requiring that cellular providers maintain information on the frequencies, power, height, and coordinates of inner cell sites and provide this information, upon reasonable request, to adjacent licensees when there is a potential interference question.

With respect to the Commission's proposal for a one-time filing for each system's CGSA boundary, ALLTEL believes that the process could be facilitated if carriers were not required to duplicate the extensive Table MOB2 and Table MOB3 information already on file with the Commission. The provision of such information could be a substantial undertaking for many carriers, particularly for those carriers operating multiple systems or in large MSAs. Consequently, ALLTEL proposes that the information submission be limited to coordinates, tower height, and transmitter power.

D. System Information Updates

ALLTEL generally supports the Commission's proposal in this area. However, ALLTEL believes that the requirement potentially to file Table MOB3 for each cell site at three times; initially, to then update the Commission's database, and also in conjunction with the filing of system identification maps is burdensome. Should there be a demonstrated need for this information, ALLTEL suggests that it be filed with the system identification updates.

**Other Matters:**

As discussed above, ALLTEL generally endorses the Commission's proposed rule changes as being in the public interest. Along with these rule revisions, ALLTEL believes that there are several other areas or rules that should be addressed or revised to ensure that licensees in the public mobile services are fully qualified to provide service to the public as expeditiously as possible. First, ALLTEL encourages the Commission to complete its proceeding on toll fraud, CC Docket No. 93-292, and to adopt the proposals set forth in the CTIA comments filed on January 14, 1994. Second, the necessity of having to deal with coordinates from two sets of data - NAD83 for the FAA and NAD27 for the Commission - continues to generate confusion and delay. This is particularly true in those instances where there are transmitters licensed for different services on the same tower. Because of this, ALLTEL believes that it is in the public interest if some accommodation could be reached and either the FAA's or the FCC's database used for tower height and coordinate verification.

**Conclusion**

In summary, ALLTEL commends the Commission for its ongoing evaluation of rule changes that facilitate and expedite the provision of cellular service. We believe that the minor revisions proposed herein will build on that significant effort.

Respectfully submitted,

ALLTEL Mobile Communications, Inc.

By



Carolyn C. Hill  
ALLTEL Service Corporation  
655 15th Street, NW, Suite 220  
Washington, DC 20005

Its Attorney

June 20, 1994

**Certificate of Service**

I, Rita Ferrando, do hereby certify that on this day of June 20, 1994, copies of the foregoing comments were served by hand, or by U. S. Mail, postage prepaid on the following:

Mr. A. Richard Metzger  
Acting Chief, FCC Common Carrier Bureau  
1919 M Street NW, Room 500  
Washington, DC 20554

John Cimko, Chief  
Mobile Services Division  
FCC Common Carrier Bureau  
1919 M Street NW, Room 644  
Washington, DC 20554

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1919 M Street NW, Room 246  
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Rita Ferrando

June 20, 1994